

# EXHIBIT 17

## **DECLARATION OF ANDREW DALLAS**

Andrew Dallas declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746:

1. My name is Andrew Dallas. I am 60 years old. I live in Jefferson County, Missouri.
2. In 1969, I was diagnosed with epilepsy. From 1991 to 2008, I had seizures upwards of three times a day. This lasted until my doctors found the right medications that worked for me. From 2008 until a few years ago, I still was having seizures, but only about one or two a month. Around 2019, when I moved back to St. Louis and switched doctors, I began having frequent seizures again. On average, I now have one seizure per week, but when I am feeling particularly stressed, I will have them more frequently, sometimes as many as three seizures a week. I also have been diagnosed with depression and anxiety.
3. My epilepsy makes it hard for me to leave the house. Many things in my day-to-day life can cause a seizure including: stress, skipping meals, a poor diet, loud sounds, and not getting enough sleep. I receive Supplemental Security Income (SSI) and MO HealthNet (Medicaid) benefits based on my disabilities.
4. As a result of my frequent seizures, I often feel confused. For example, I will be watching a TV show, and suddenly I won't be able to retain what is going on, or I will be in the middle of a conversation and will forget what I am talking about. This "brain fog" is embarrassing to me, but my doctors have not been able to prescribe any treatment for it. It affects my self-esteem and makes me feel inferior. It has also worsened over time.
5. Medicaid approved me for 21 hours per week of home health aide services. My aide helps me by cleaning my home, shopping for groceries, preparing my meals, and transporting me to appointments.

6. I currently receive \$914 per month in Supplemental Security Income (SSI) benefits. My expenses such as rent and utilities use up most of my income each month. I rely on SNAP to purchase food. I receive \$203 in SNAP benefits. I have no other source of income and no savings.
7. I have a driver's license, but I am not able to drive because of my epilepsy. In order to drive, I must go six months without a seizure. I haven't been able to drive since before 2019 because my seizures occur too often now. I do not own a car. My home health aide does my grocery shopping, and I can sometimes get a ride from a close friend if I pay him gas money.
8. My SNAP benefits sometimes do not last the entire month. When that happens, I get food donations from St. David's Catholic Church in Arnold, MO.
9. In January 2023, the Department of Social Services (DSS) mailed my SNAP recertification paperwork to me. The letter I received said that if I do not recertify by February 28, 2023, my SNAP benefits will end. DSS's forms are complicated and confusing and use terms that I do not understand. I do not feel confident completing them by myself without assistance.
10. I tried to contact DSS's call center to ask for help with this paperwork.
11. On February 8 and February 9, 2023, I called DSS's information line at (855) 373-4636 about ten times. On at least three tries, I was not able to get past the main menu's language prompts. I was told to press 1 for English, but after pressing 1, the instructions would repeat. I would press 1 again, and then the call would disconnect. This left me incredibly stressed, confused, and frustrated. After taking a break and calling back later in the day, I finally got past the main menu prompts. I was put on hold and told that there were 234

callers ahead of me. I did not know how long I would have to wait to get to the front of the line. I decided to hang up after waiting for a few minutes.

12. I might be able to do the recertification process myself if DSS's notices and forms were easier to understand. The questions on the paperwork make me confused. I worry about misunderstanding and not completing the documents correctly.
13. I have been trying to ask for help from DSS. I was hoping someone would help me complete my form by talking to me over the phone and by explaining to me how I should answer the questions I find confusing. I have not been able to get through the phone system to ask for this help. I would prefer to make contact with DSS over the phone because I can't easily get to an office for assistance. I don't have a car so I am completely dependent on others to drive me where I need to go. It can be expensive to pay for a friend's gas or for a cab ride. I also have trouble walking and am a fall risk, so it is easier for me to stay in my home. I don't know any other way to ask DSS for help with my paperwork.
14. I have had trouble in the past completing my SNAP paperwork because I have a hard time understanding the instructions. In 2022, I called Legal Services of Eastern Missouri to get help. My advocate was able to help me complete and submit my recertification paperwork to DSS. With my advocate's help, my recertification was successful. I received SNAP benefits throughout 2022. I would not have been able to successfully recertify without my advocate's help.
15. If I am unable to recertify and lose my SNAP benefits, I won't be able to afford to buy enough food to survive. I need SNAP benefits to eat, and the thought of not having SNAP makes me very scared and anxious, especially because a poor diet and skipping meals triggers my seizures and my health gets worse without enough healthy food.

Dated: February 27, 2023

St. Louis, Missouri



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Andrew Dallas